

March 30, 2017

Elizabeth Hughes, Town Planner
Brooke Whiting Cash, Chair, Planning Board
Robert Sepucha, Chair, Zoning Board of Appeals
Town of Concord
141 Keyes Road
Concord, MA 01742

Re: ITW Middlesex Cell Tower - Abutters Response to 3.10.17 Planning Board Report

Dear Elizabeth, Brooke and Robert,

To date we have written you citing zoning board violations, economic and health concerns, and the failure of the balloon test regarding the proposed ITW Middlesex School cell tower.

This week, you will receive another letter from us identifying a number of very troubling fundamental deficiencies and omissions in the ITW application, which we believe compel the Town to reject the pending application and deny the request for Special Permit.

Today we are writing you as we have specific concerns with some of the conclusions drawn in the Planning Board Report dated March 10, 2017:

- **Property Values.** "The Town Assessor has stated that the Assessing Department currently sees no reduction in property values due to close proximity of cell towers." (Page 12) The reference point is a lone one line email from Lane Partridge. We believe a reasonable observer would find that there should be an accompanying analysis to validate this conclusion – especially as the information that we have found concludes otherwise. We ask that the Board request the Assessor's office to conduct and provide a thorough and comprehensive independent analysis including data, including but not limited to consideration of historical data from other similar Towns.
- **MA Register for Historic Places.** According to the Massachusetts Historical Commission, the Middlesex School campus is eligible to be listed on the state Register for Historic places. However, Middlesex School is saying the project site is in the "modern portion of campus", not within 1,000 feet of an eligible or listed state Register of Historic Places. (Page 7) These statements seem to conflict. We ask the Board to request that the Historical Districts Commission weighs into the proceedings.
- **Endangered Wildlife:** According to Estabrook Woods, "Middlesex School's portion of the Estabrook Woods contains habitats for five state-listed species: A globally-endangered dragonfly and four Species of Special Concern: the Blue Spotted Salamander, the Elderberry Long horned Beetle, the Spotted Turtle, and the Mystic Valley Amphipod. The woods are also a breeding site of at least three watch list species: the Spotted Salamander, Northern Leopard Frog, and Northern Goshawk." This is contradictory to the statement that "This site is not located within the habitat of a state listed rare or endangered wildlife or rare plant species." (page 8). We also note that proposed site is clearly located in a designated priority habitat of rare species as listed by Massachusetts; specifically, the proposed site is located in Massachusetts Priority Habitat No. PH-1381. We are unsure why the Town Planner's report does not acknowledge this fact. We ask you that you confirm with the Division of Natural Resources and any other relevant state and federal agencies.

- **Options Considered.** Using your GIS website, there seems to be other options that Middlesex School could consider that do not have wetlands and do not violate zoning board violations such as not locating within 1,000 of residential homes. However, "The Applicant **states** other campus locations were examined and rejected by the development team because of factors such as wetland impacts, zoning restrictions, coverage studies and limitations, distance from existing utilities and potential visual impacts on the community. The Town's **outside consultant has found** the application conforms to this section." (page 4) Not only does this demonstrate a lack of exploration and investigation, it is devoid of analysis. We recommend that you ask Middlesex School to explore other options as they seem to exist (see **Exhibit 1**).

Our intent is to ensure that the Planning Board and Zoning Board of Appeals are not making decisions based on misleading information, poor methodology and bad conclusions.

Sincerely,

Residents of Bartkus Farm

Suzanne and Rob Mirak (#6)
Bin Weng and Kun Liu Weng (#8)
Scott Li and Shirley Ao (#9)
Aram and Anna Adourian (#11)
Lisa Hansel (#14)
AJ and Sheila Sohn (#15)
Stuart and Laura Strong (#16)
Ignacio and Rosie Garcia (#17)
Dan and Julie del Sobral (#18)

Exhibit 1

GIS Overlay of Wetlands on the Middlesex School Campus

Source: (<https://www.mapsonline.net/concordma/index.html>)

